

Message

From: Snyderman, Steven [Snyderman.Steven@epa.gov]
Sent: 7/9/2018 5:21:34 PM
To: Perry, Tracy [Perry.Tracy@epa.gov]
CC: Jakob, Avivah [Jakob.Avivah@epa.gov]
Subject: RE: Malathion---sales information
Attachments: 2a Malathion ag nonag 2005 - 2014.xlsx; FMC Comment Final Response to EPA HHRA - Dec 21, 2016.pdf; Restricted comments due to copyright data.docx; RE: Malathion Stereochemistry; FMC Attachment_4.pdf; FMC Attachment_5.pdf; FMC Comment.pdf; FMC Attachment_1.pdf; FMC Attachment_2.pdf; FMC Attachment_3.pdf

Tracy,

I just spent the last hour trying to find the information you're looking for but I really think your best bet to find it is going to be reaching out to Paul at FMC, I can't spend any more time on this sadly. Attached is as close as I got to finding it. Attached is an email referencing the additional submitted data but not including it, "data based on a survey from AMCA, Cheminova's historical sales data for the FYFANON ULV Mosquito product information obtained from our exclusive distributor of that product." Excel sheet attached is not the usage data you're looking for as it's from the storm water quality of Sacramento input and California specific but may be helpful.

FMC claims it was included in their comments on the BE but I've attached all of them and I don't think that's what you're looking for. It's also not in the restricted comments that were held back due to copyright data. It honestly would be far easier for you to just send an email and confirm.

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From: Perry, Tracy
Sent: Thursday, July 05, 2018 11:29 AM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>
Cc: Jakob, Avivah <Jakob.Avivah@epa.gov>
Subject: Malathion---sales information

Hi Steven

In the attached comment on the malathion BE (see p. 5), Intrinsik stated that Cheminova's sales data (2011-14) would be provided to EPA under separate cover since it is CBI. Do you have those data? I am trying to avoid contacting the registrant for info. they have already provided.

-Tracy

From: Perry, Tracy
Sent: Tuesday, April 03, 2018 5:27 PM
To: Garber, Kristina <Garber.Kristina@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Becker, Jonathan <Becker.Jonathan@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>
Cc: Miller, Wynne <Miller.Wynne@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Guilaran, Yu-Ting <Guilaran.Yu-Ting@epa.gov>; Sherman, Kelly <Sherman.Kelly@epa.gov>
Subject: Malathion---mosquito usage info.

Hi all,

I contacted Steven Snyderman, the previous CRM for malathion, to ask about mosquito adulticide usage information that may have been gathered around the time of the 2016 letter to AMCA and members. He sent me several resources that look promising (especially the first -- see below description of attachments):

- 1) Cheminova's Intrinsic report (sent as part of their comments on the malathion BE). This is probably the most useful. It contains what they consider to be the best available information on the mosquito adulticide use. They combined the 4 data sets below to generate a list of counties where ULV malathion mosquito adulticide application have been made (covering years 2003-2014)
 - a. AMCA survey
 - b. Cheminova/FMC survey of sales and distributors by county
 - c. FL- publically available usage info.
 - d. CA - publically available usage info.
- 2) Sept. 14, 2016 EPA Notice to AMCA and members -- we developed the attached notice based on a 2016 August workshop on malathion mosquito use -- involved AMCA, USDA-IR-4, CDC (attached is EPA notice and our summary notes from the workshop)
 - a. Mosquito control districts involved: Christopher Lesser (Manatee County Mosquito Control District), Peter Bronkrude (Shasta California Mosquito Control District), Gary Goodman (Sacramento-Yolo California Mosquito Control District), Mark Latham (Manatee County Florida Mosquito Control District), Curt Bowers (Jefferson Davis Parish Louisiana Mosquito Abatement District), Angela Beehler (Benton County Washington Mosquito Control District)
 - b. Notice advises users on how mosquito adulticide aerial applications can be made to better protect residents from exposures to malathion; describes the risk as it relates to droplet size, application release height, and rate
- 3) FMC voluntarily updated their label (attached -- Fyfanon ULV mosquito control EPA Reg. # 279-3539) in Nov. 2016 to lower rate range from 2.6 -- 3.0 fl. Oz product/acre to 1.0 -- 3.0 fl. Oz./acre, based on efficacy data showing that it is effective at rates as low as 1.0 fl. Oz/acre, which some mosquito control districts reported using

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